

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

SEP 05 2018

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JOSEPH MALDONADO-PASSAGE,  
a/k/a Joseph Allen Maldonado,  
a/k/a Joseph Allen Schreibvogel,  
a/k/a "Joe Exotic,"

Defendant.

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY Carmela Cook, DEPUTY

**CR 18-227 SLP**

No. \_\_\_\_\_

Violation: 18 U.S.C. § 1958(a)

**INDICTMENT**

The Federal Grand Jury charges:

At all times relevant to this Indictment:

1. Defendant **JOSEPH MALDONADO-PASSAGE** was a resident of the Western District of Oklahoma.
2. "Jane Doe" was a resident of the state of Florida.
3. Beginning at least by February 2014, **MALDONADO-PASSAGE** posted content online, including on Facebook and YouTube websites, containing threats of violence against Jane Doe.

**Count 1**

**(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire)**

4. The Federal Grand Jury incorporates paragraphs 1-3 by reference.
5. At least by early November 2017, **MALDONADO-PASSAGE** inquired of Individual 1 whether Individual 1 would travel to Florida to murder Jane Doe in exchange for a sum of money. Individual 1 told **MALDONADO-PASSAGE** that he would travel to Florida to murder Jane Doe in exchange for a sum of money.
6. On or about November 6, 2017, **MALDONADO-PASSAGE** caused Individual 1 to travel from the Western District of Oklahoma to Dallas, Texas, to obtain a fake identification card for use in a proposed plot for Individual 1 to travel to Florida to murder Jane Doe.
7. On or about November 25, 2017, **MALDONADO-PASSAGE** used the U.S. Postal Service to mail Individual 1's cell phone from the Western District of Oklahoma to Nevada to conceal Individual 1's involvement in a proposed plot to murder Jane Doe in Florida.
8. On or about November 25, 2017, in the Western District of Oklahoma, **MALDONADO-PASSAGE** gave Individual 1 approximately \$3,000 in cash in exchange for Individual 1's agreement to travel to Florida to murder Jane Doe. **MALDONADO-PASSAGE** promised to pay Individual 1 thousands of dollars more after Individual 1 murdered Jane Doe.
9. **MALDONADO-PASSAGE** agreed with Individual 1 that Individual 1 would travel from the Western District of Oklahoma to South Carolina, and then to Florida,

to murder Jane Doe.

10. On or about November 26, 2017, Individual 1 traveled from the Western District of Oklahoma to South Carolina.

11. No physical harm came to Jane Doe as a result of **MALDONADO-PASSAGE**'s proposed plot for her murder.

12. In or about November 2017, in the Western District of Oklahoma and elsewhere,

----- **JOSEPH MALDONADO-PASSAGE,**  
**a/k/a Joseph Allen Maldonado,**  
**a/k/a Joseph Allen Schreibvogel,**  
**a/k/a "Joe Exotic,"** -----

caused another person to travel in interstate commerce, used and caused another person to use the mail, and used and caused another person to use any facility of interstate commerce, with intent that the murder of Jane Doe be committed in violation of the laws of the state of Oklahoma and the state of Florida as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

### **Count 2**

#### **(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire)**

13. The Federal Grand Jury incorporates paragraphs 1-3 by reference.

14. Beginning in approximately July 2016, and continuing through approximately March 2018, **MALDONADO-PASSAGE** repeatedly asked Individual 2

whether Individual 2 could find someone to murder Jane Doe in exchange for a sum of money.

15. On or about December 5, 2017, Individual 2 called from his cell phone and spoke with **MALDONADO-PASSAGE** on his cell phone. Individual 2 offered to introduce **MALDONADO-PASSAGE** to a person who would be willing to murder Jane Doe in exchange for a sum of money. **MALDONADO-PASSAGE** agreed to the meeting.

16. On or about December 8, 2017, Individual 2 introduced **MALDONADO-PASSAGE** to an undercover FBI agent, and together the three individuals discussed the details of **MALDONADO-PASSAGE**'s proposed plot to murder Jane Doe.

17. On various dates from December 2017 to March 2018, **MALDONADO-PASSAGE** used his cell phone to speak with Individual 2 on his cell phone about using the undercover FBI agent to murder Jane Doe.

18. No physical harm came to Jane Doe as a result of **MALDONADO-PASSAGE**'s proposed plot for her murder.

19. Beginning at least by December 5, 2017, and continuing through about March 2018, in the Western District of Oklahoma,

----- **JOSEPH MALDONADO-PASSAGE,**  
**a/k/a Joseph Allen Maldonado,**  
**a/k/a Joseph Allen Schreibvogel,**  
**a/k/a "Joe Exotic,"** -----

used and caused another person to use any facility of interstate commerce, with intent that the murder of Jane Doe be committed in violation of the laws of the state of Oklahoma and the state of Florida as consideration for the receipt of, and as consideration for a promise

and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "William Brown", written in a cursive style.

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER  
First Assistant United States Attorney

A handwritten signature in black ink, appearing to read "Amanda Green", written in a cursive style.

AMANDA GREEN  
Assistant U.S. Attorney